

ALEX G. TSE (CABN 152348)
Acting United States Attorney
BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division
MATTHEW L. McCARTHY (CABN 217871)
JULIE D. GARCIA (CABN 288624)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Matthew.McCarthy@usdoj.gov
Julie.Garcia@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 17-519 RS
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE CHANGE OF
v.)	PLEA HEARING AND [PROPOSED] ORDER
)	
SHAREE MARTELL HALL,)	
)	
Defendant.)	

The above-captioned matter is set for a change of plea hearing on March 15, 2018. The parties now stipulate and respectfully request that the hearing be continued to March 28, 2018, at 9:30 am.

As discussed on the record on February 28, 2018, defense counsel is working to confirm that, post-plea, there will be a space for the defendant in a residential treatment center that offers psychiatric and reentry services. Defense counsel has been working diligently toward that goal and is coordinating with the Probation Office but has not yet been able to find a treatment center with a confirmed space for the defendant. Accordingly, the parties respectfully request that the change of plea hearing be continued to permit defense counsel additional time to make such preparations.

The parties further stipulate that the time between March 15, 2018, and March 28, 2018, should

1 be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B).
2 Excluding these periods of time will allow defense counsel the reasonable time necessary for effective
3 preparation, including preparations for the defendant's placement in a residential treatment center,
4 taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(7)(B)(iv).

5
6 IT IS SO STIPULATED.

7 ALEX G. TSE
8 Acting United States Attorney

9 DATED: March 14, 2018

10 /s/
11 MATTHEW L. McCARTHY
JULIE D. GARCIA
Assistant United States Attorneys

12 DATED: March 14, 2018

13 /s/
14 RANDY SUE POLLOCK
Attorney for Defendant


1 ~~PROPOSED~~ ORDER

2 It is hereby ORDERED that the change of plea hearing in the above-captioned matter be
3 continued from March 15, 2018, to March 28, 2018, at 9:30 am.

4 The Court further finds that the exclusion of the period from March 15, 2018, through March 28,
5 2018, from the time limits applicable under 18 U.S.C. § 3161, is warranted; that the ends of justice
6 served by the continuance outweigh the interests of the public and the defendant in the prompt
7 disposition of this criminal case; and that the failure to grant the requested exclusion of time would
8 unreasonably deny defense counsel the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C.
10 § 3161(h)(7)(A) and (B)(iv).

11
12 IT IS SO ORDERED.

13
14
15 DATED: 3/14/18


HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE